

Zemel Law
Consumer Protection

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VIA ECF:

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Watson et al. v. Manhattan Luxury Automobiles Inc.*
Case No.: 1:20-cv-04572 (LGS)
Letter Motion to Unseal Exhibits to Plaintiffs' Motion to
Strike or Exclude Certain Expert Opinions of Defendant's
Expert Ken Sponsler

Dear Judge Schofield,

Pursuant to Your Honor's Order entered on February 28, 2022 [ECF No. 154], Plaintiffs have conferred with Defendant and determined that the Expert Reports and Deposition of Ken Sponsler (Exhibits A-D to Plaintiff's Motion to Strike) do not need to have any special redactions or be filed under seal. The only redactions made to Exhibit A and B are routine redactions of personal information of the class members and these exhibits have been attached. Please advise if the Court would like Plaintiffs to upload these redacted versions of Exhibit A and B as separate docket entries. In regards to Exhibit C and D, Plaintiff respectfully requests the Court to order Exhibits C and D attached to Plaintiffs' Motion, filed under seal at ECF 144-145, to be unsealed.

Plaintiffs remain available at the Court's convenience to discuss any further issues pertaining to this matter.

Respectfully submitted,

/s/ Daniel Zemel
Daniel Zemel, Esq.
Attorney for Plaintiffs